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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF OKLAHOMA  
LAWTON DIVISION

In Re:	§	
Robert Edward Lee, Jr.	§	Case No. 09-13964-13
Kimberly Ann Lee	§	Chapter 13
Debtor(s)	§	

DEBTOR(S) MOTION TO EXTEND AUTOMATIC STAY

Come Now Debtors, by counsel, and for this Motion state as follows:

1. Debtor(s) filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 07-13289-NLJ-13 filed on 9/12/2007.
3. Debtor(s) seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor(s) prior case was dismissed for: Debtors were plagued with numerous medical afflictions in the past year. In July 2008, Debtors' daughter was ordered to undergo a battery of tests for gallbladder attacks. In September 2008, Debtor suffered from chest pains and doctors ordered several cardiac tests. Prior to our first filing, Joint Debtor lost an eye due to cancer, and in March 2009, she had to replace her prosthetic eye due to infection. Joint Debtor is also seeing an orthopedist, who prescribed a series of Viscus shots in April 2009, in order to delay knee surgery. In May 2009, Debtors' daughter was admitted to the hospital for another gallbladder attack. She eventually had surgery in June 2009.
5. The following change(s) of circumstances demonstrate that the Debtor(s) can perform this plan and are likely to complete the case successfully: The family's health is well managed and plan payments are lower and more manageable.

WHEREFORE, Debtor(s) request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,  
/s/Monte J. White  
Attorney for Debtor(s)

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on July 29, 2009 on all parties on the mailing matrix:

/s/Monte J. White  
Attorney for Debtor(s)

Debtor(s): **Robert Edward Lee, Jr.**  
**Kimberly Ann Lee**

Case No:  
 Chapter: 13

**WESTERN DISTRICT OF OKLAHOMA**  
**LAWTON DIVISION**

Altus Finance Inc./ H & H Furni  
 310 W. Commerce  
 P.O. Box 1129  
 Altus, OK 73522

Continental Credit  
 SFC-Central Bankruptcy & Recove  
 652 Bush River Rd. Suite 206  
 Columbia, SC 29210

IRS Special Procedures  
 55 N Robinson Stop 5024  
 Oklahoma City, OK 73102

American Collection Services/Ja  
 3100 Sw 59th St  
 Oklahoma City, OK 73119

Dean McGee Eye Institute  
 608 Stanton L. Young Blvd.  
 Oklahoma City, OK 73104

Jackson County Memorial Hospita  
 P.O. Box 8190  
 Altus, OK 73522

American Open MRI-Altus  
 1116 N. Main Street Suite M12  
 Altus, OK 73521

First Premier Bank  
 601 S Minnesota Ave  
 Sioux Falls, SD 57104

Jackson County Treasurer  
 PO Box 939  
 Altus, OK 73522

Associated Credit Services, Inc  
 P.O. Box 9100  
 Hopkinton, MA 01748-9100

First Premier Bank  
 P.O. Box 2208  
 Vacaville, CA 95696

Kimberly Ann Lee  
 1412 Adams  
 Altus, OK 73521

Base Credit  
 205 W. Broadway  
 Altus, OK 73521

First State Bank of Altus  
 712 N Main St  
 Altus, OK 73521

Lowes/MBGA  
 P.O. Box 530914  
 Atlanta, GA 30353-0914

Blossom Shop  
 410 East Broadway  
 Altus, OK 73521

G M A C  
 PO Box 130424  
 Roseville, MN 55113

Monte J. White & Associates  
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 Wichita Falls TX 76301

Capital One Auto Finance  
 c/o Ascension Capital Group  
 P.O. Box 201347  
 Arlington, Texas 76006

Heartland Ln  
 1501 N Main St  
 Altus, OK 73521

Morningstar Emergency Phys  
 9301 S Western Ave  
 Oklahoma City, OK 73139-2728

Central State Recovery/JCMH  
 1314 N Main St  
 Hutchinson, KS 67501

HSBC NV  
 P.O. Box 19360  
 Portland, OR 97280

National Bureau of Collections,  
 5922 SE 15th Street  
 P.O. Box 10718  
 Midwest City, OK 73140

Comanche County Memorial Hospit.  
 P O Box 289  
 Lawton, OK 73502-0289

Internal Revenue Service  
 55 North Robinson Stop 5024  
 Oklahoma City, OK 73102

Oklahoma Tax Commission  
 Bankruptcy Section  
 PO Box 53248  
 Oklahoma City, OK 73152-3248

Community State Bank  
 Attn: Bankruptcy Clerk  
 PO Box 3910  
 Tupelo, MS 38803

Internal Revenue Service  
 55 N. Robinson Stop 5024  
 Oklahoma City, OK 73102

Oklahoma Tax Commission  
 PO Box 53248  
 Oklahoma City, OK 73152-3248

Debtor(s): Robert Edward Lee, Jr.  
Kimberly Ann Lee

Case No:  
Chapter: 13

WESTERN DISTRICT OF OKLAHOMA  
LAWTON DIVISION

Premier Bankcard/Charter  
PO Box 2208  
Vacaville, CA 95696

Western Shamrock Corp  
801 S Abe St  
San Angelo, TX 76903

Rexco Drug-5991  
1122 North Main St.  
Altus, OK 73521

Works & Lentz, Inc.  
3030 Northwest Expressway  
Suite 225  
Oklahoma City, Oklahoma 73112-5

Reynaldo T Tolentino MD PA  
1015 Hillcrest Dr  
Vernon, TX 76384

World Acceptance Corp./Midweste:  
Attn: Bankruptcy Processing Cen  
P.O. Box 6429  
Greenville, SC 29606

Robert Edward Lee, Jr.  
1412 Adams  
Altus, OK 73521

World Acceptance Corporation/  
Midwestern Loans, Inc.  
Attn: Bankruptcy Processing Cen  
P.O. Box 6429  
Greenville, SC 29606

Security Finance  
P.O. Drawer 811  
Spartanburg, SC 29304

World Acceptance Corporation/  
Midwestern Loans  
1521 Main St  
Vernon, TX 76384

Shamrock Bk  
125 N Main  
Coalgate, OK 74538

Silhouettes  
340 Poplar Street  
Hanover, PA 17331

Sun Loans  
1511 N. Main  
Altus, OK 73521

Sun Loans  
201 N Spureon  
Altus, OK 73521

Wells Fargo Bank NA  
PO Box10335  
Des Moines, IA 50306